

EXHIBIT E

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Holden Benon (State Bar No. 325847)
Kathleen J. McMahon (State Bar No. 340007)
JOSEPH SAVERI LAW FIRM, LLP
601 California Street, Suite 1000
San Francisco, CA 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
Email: jsaveri@saverilawfirm.com
czirpoli@saverilawfirm.com
cyoung@saverilawfirm.com
hbenon@saverilawfirm.com
kcmcmahon@saverilawfirm.com

Matthew Butterick (State Bar No. 250953)
1920 Hillhurst Avenue, #406
Los Angeles, CA 90027
Telephone: (323) 968-2632
Facsimile: (415) 395-9940
Email: mb@buttericklaw.com

*Counsel for Individual and Representative Plaintiffs
and the Proposed Class*

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, Sarah Silverman, Christopher
Golden, Michael Chabon, Ta-Nehisi Coates, Junot
Díaz, Andrew Sean Greer, David Henry Hwang,
Matthew Klam, Laura Lippman, Rachel Louise
Snyder, Ayelet Waldman, and Jacqueline Woodson,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc., a Delaware corporation;

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' FIRST SET OF
REQUESTS FOR PRODUCTION TO
DEFENDANT META**

8. In responding to these Requests for Production, You are to Include Documents (1) obtained from witnesses who gave information to any governmental agency or investigatory body, including Congress; (2) that constitute, refer or relate to summaries of testimony or other statements in connection with any governmental agency or investigatory body proceeding or investigation, including before Congress; or (3) obtained on Your behalf in preparation for testimony or interviews before any governmental agency or investigatory body, including Congress.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1

The Training Data for Llama 1.

REQUEST FOR PRODUCTION NO. 2

The Training Data for Llama 2.

REQUEST FOR PRODUCTION NO. 3

The Training Data for Llama 3.

REQUEST FOR PRODUCTION NO. 4

The Training Data comprising the “Books3” dataset referenced in the paper “LLaMA: Open and Efficient Foundation Language Models,” and all Documents and Communications Concerning Your selection and assembly of this dataset.

REQUEST FOR PRODUCTION NO. 5

The Training Data comprising the “Gutenberg” dataset referenced in the paper “LLaMA: Open and Efficient Foundation Language Models”, and all Documents and Communications Concerning Your selection and assembly of this dataset.

REQUEST FOR PRODUCTION NO. 6

Documents and Communications to, from, or with Project Gutenberg Concerning Training Data.

REQUEST FOR PRODUCTION NO. 7

Documents and Communications to, from, or with Library Genesis (aka LibGen) Concerning Training Data.

REQUEST FOR PRODUCTION NO. 47

All Documents and Communications Concerning the action entitled *Huckabee et al. v. Meta Platforms, Inc.*, Case No. 1:23-cv-09152 (S.D.N.Y), Including any Documents and Communications You produce, or have produced, to any parties (or third-parties) in that action.

REQUEST FOR PRODUCTION NO. 48

All Documents You relied on in responding to Plaintiffs' Interrogatory No. 14, served concurrently herewith.

REQUEST FOR PRODUCTION NO. 49

All Documents and Communications Concerning the decision to release the Meta Language Models under what Meta calls an "open source" license.

REQUEST FOR PRODUCTION NO. 50

All Documents and Communications Concerning any individuals or entities who have been given access to, or denied or limited access from, Llama 1 or Llama 2.

Dated: December 27, 2023

By: /s/ Joseph R. Saveri

Joseph R. Saveri

Joseph R. Saveri (State Bar No. 130064)

Cadio Zirpoli (State Bar No. 179108)

Christopher K.L. Young (State Bar No. 318371)

Holden Benon (State Bar No. 325847)

Kathleen J. McMahon (State Bar No. 340007)

JOSEPH SAVERI LAW FIRM, LLP

601 California Street, Suite 1000

San Francisco, California 94108

Telephone: (415) 500-6800

Facsimile: (415) 395-9940

Email: jsaveri@saverilawfirm.com

czirpoli@saverilawfirm.com

cyoung@saverilawfirm.com

hbenon@saverilawfirm.com

kmcmahon@saverilawfirm.com

Matthew Butterick (State Bar No. 250953)
1920 Hillhurst Avenue, #406
Los Angeles, CA 90027
Telephone: (323) 968-2632
Facsimile: (415) 395-9940
Email: mb@buttericklaw.com

Bryan L. Clobes (*pro hac vice anticipated*)
**CAFFERTY CLOBES MERIWETHER
& SPRENGEL LLP**
205 N. Monroe Street
Media, PA 19063
Tel: 215-864-2800
bclobes@caffertyclobes.com

Alexander J. Sweatman (*pro hac vice anticipated*)
**CAFFERTY CLOBES MERIWETHER
& SPRENGEL LLP**
135 South LaSalle Street, Suite 3210
Chicago, IL 60603
Tel: 312-782-4880
asweatman@caffertyclobes.com

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

PROOF OF SERVICE

I, the undersigned, am employed by the Joseph Saveri Law Firm, LLP. My business address is 601 California Street, Suite 1000, San Francisco, California 94108. I am over the age of eighteen and not a party to this action.

On December 27, 2023, I caused the following documents to be served by email upon all persons appearing on the attached Service List:

- **PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION TO DEFENDANT META**

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 27, 2023.



Ruby Ponce

SERVICE LIST

Bobby A. Ghajar
Colette Ani Ghazarian
COOLEY LLP
1333 2nd Street, Suite 400
Santa Monica, CA 90401
Email: bghajar@cooley.com
cghazarian@cooley.com

Judd D. Lauter
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
Email: jlauter@cooley.com

Kathleen R. Hartnett
COOLEY LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Email: khartnett@cooley.com

Mark Alan Lemley
LEX LUMINA PLLC
745 Fifth Avenue, Suite 500
New York, NY 10151
Email: mlemley@lex-lumina.com